

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

TATYANA LYSYY, VASILIIY LYSYY, et al., )  
Plaintiffs, )  
v. )  
DEUTSCHE BANK NATIONAL TRUST )  
COMPANY and DEUTSCHE BANK NATIONAL )  
TRUST COMPANY, as Trustee etc., et al., )  
Defendants. )

NO. 2:24-cv-00062-JLR

PLAINTIFFS' REQUEST  
FOR EXTENSION OF TIME

COMES NOW Richard L. Pope, Jr., counsel for Plaintiffs Tatyana Lysyy and Vasiliy Lysyy, and respectfully moves this Court, pursuant to Local Civil Rule 6 and Federal Rule of Civil Procedure 6(b), for an extension of time to comply with the Court's Order dated June 24, 2025 (Dkt. # 149), which requires submission of email messages believed to be from Peter Kuzmenko for in-camera review by 5:00 PM PDT on Friday, June 27, 2025. Counsel seeks an extension to noon on Monday, June 30, 2025, to allow sufficient time to address the challenges outlined below.

I. GOOD CAUSE FOR EXTENSION

1. **Volume of Responsive Emails** Counsel has identified dozens of emails potentially responsive to the Court's Order, requiring significant time to review and compile. Each e-mail must be downloaded or saved as PDF or EML, and then labeled meaningfully (such

as date/time 2025-06-27 1659) to be further processed and organized. With the current deadline at 5:00 PM PDT today, June 27, 2025, timely compliance is infeasible.

2. **Uncertainty of Format** The Court's Order (Dkt. # 149) does not specify the required format for submission (e.g., paper, PDF, or EML files from the email server). If paper or PDF format is required, converting attached files or producing paper copies would be particularly burdensome, necessitating clarification and additional preparation time.
3. **Professional and Personal Stressors** Counsel has been extremely busy and stressed this week, managing obligations and complexities in this case, including the recent Order to Show Cause and the proceedings on Monday and Tuesday, June 23-24, 2025, and other client matters scheduled for Thursday and Friday, June 26-27, 2025. (extremely full days, scheduled around and after the original scheduled trial dates. These competing demands have prevented adequate focus on this task, especially given the late hour.

## II. REQUESTED RELIEF

Counsel requests an extension to noon on Monday, June 30, 2025, to submit the emails, and clarification on the required format to ensure compliance. This short extension provides a reasonable window to address the volume and format issues while respecting the Court's schedule (and the clear intention of urgency in compliance).

Respectfully submitted this 27<sup>th</sup> day of June 2025.

/s/ Richard L. Pope, Jr.  
RICHARD L. POPE, JR.  
WSBA # 21118  
Attorney for Plaintiffs

Lake Hills Legal Services P.C.  
15600 N.E. 8<sup>th</sup> Street, Suite B1-358  
Bellevue, Washington 98008  
Tel: (425) 829-5305  
Fax: (425) 526-5714  
E-Mail: [rp98007@gmail.com](mailto:rp98007@gmail.com)

1 **PENALTY OF PERJURY STATEMENT**

2 I, Richard L. Pope, Jr., declare under penalty of perjury under the laws of the United States that  
3 the foregoing is true and correct to the best of my knowledge and belief, executed on June 27,  
4 2025 at Bellevue, Washington.

5  
6 /s/ Richard L. Pope, Jr.  
RICHARD L. POPE, JR.

7  
8 **CERTIFICATE OF SERVICE**

9 I hereby certify that on the date set forth below, I caused the above document to be  
10 delivered through electronic court filing (ECF) to:

11 Midori R Sagara [msagara@buchalter.com](mailto:msagara@buchalter.com), [kreger@buchalter.com](mailto:kreger@buchalter.com),  
12 [midori.sagara@gmail.com](mailto:midori.sagara@gmail.com)

13 Richard Lamar Pope , Jr [rp98007@gmail.com](mailto:rp98007@gmail.com)

14 Robert William McDonald [rmcdonald@qualityloan.com](mailto:rmcdonald@qualityloan.com), [cvnotice@mccarthyholthus.com](mailto:cvnotice@mccarthyholthus.com),  
[rockymcdonald@gmail.com](mailto:rockymcdonald@gmail.com)

15 Timothy J Feulner [tim@feulnerlawoffice.com](mailto:tim@feulnerlawoffice.com)

16 DATED: June 27, 2025.

17  
18 /s/ Richard L. Pope, Jr.  
RICHARD L. POPE, JR.